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Attorneys for Defendant Ford Motor Company

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

Karen Elliott, an individual,

Plaintiff,

v.

Ford Motor Company, a Delaware
Corporation, TRW Automotive Holdings
Corp., a Delaware Corporation; and Autoliv
Inc., a foreign corporation,

Defendants.

No. CV 2004 0902 PHX SRB

AFFIDAVIT OF IMAN R. SOLIMAN

(Honorable Susan R. Bolton)

STATE OF ARIZONA)
)ss.
COUNTY OF MARICOPA)

I, Iman R. Soliman, duly sworn upon oath, deposes and says:

1. On or about March 2, 2006, Ford's counsel called Dr. Rizzo's office and spoke with the office supervisor and Dr. Rizzo's wife, Karen Rizzo, regarding Dr. Rizzo's deposition fee.
2. During the telephone call, Karen Rizzo indicated that she needed to talk to Dr. Rizzo to find out if he is willing to lower his fee. After speaking with Dr. Rizzo, Karen Rizzo called Ford's counsel and stated that Dr. Rizzo is

1 refusing to lower his fee and that if we filed a motion to reduce his fee that
2 he will be agitated at the deposition and "you don't want to agitate him."

3 3. Because Karen Rizzo thought Ford's counsel was plaintiff's counsel who
4 will be making money off of this lawsuit, she explained that Dr. Rizzo is
5 justified to charge \$1,200.00 per hour. However, after Ford's counsel
6 clarified that she in fact represents defendant and not plaintiff, Karen
7 Rizzo agreed to charge \$750.00 an hour rather than \$1,200.00. After
8 additional negotiations and at Ford's counsel's request that Dr. Rizzo
9 charge \$500.00, an agreement was reached that Dr. Rizzo will charge
10 \$600.00 per hour.

11 4. The deposition had to be cancelled because plaintiff's counsel had not
12 provided Ford's counsel with the signed medical release to obtain Dr.
13 Rizzo's file. Eventually Dr. Rizzo's deposition was rescheduled for
14 September 8, 2006. However, Ford's counsel was informed that Dr.
15 Rizzo will be charging his full fee of \$1,200.00 an hour.

16 5. Ford's counsel again spoke with Karen Rizzo regarding the earlier
17 agreement in an attempt to lower Dr. Rizzo's fee to a reasonable amount.
18 However, Ford's counsel was informed that Dr. Rizzo will not lower his

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1 fee. As a result, Ford canceled Dr. Rizzo's deposition in order to file this
2 motion.

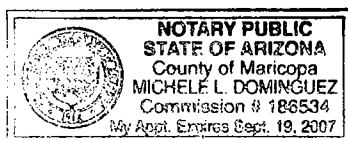
3 **FURTHER AFFIANT SAITH NOT**

4 DATED this 3rd day of October, 2006.

5
6 
7 Iman R. Soliman
8

9 STATE OF ARIZONA)
10)ss.
11 COUNTY OF MARICOPA)

12 SUBSCRIBED AND SWORN to before me this 3rd day of October, 2006, by
13 Iman R. Soliman.




Notary Public